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**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Case No. 3:22-cr-00081-MO**

**Plaintiff,**

**v.**

**DEFENDANT'S UNOPPOSED  
MOTION TO CONTINUE TRIAL  
DATE**

**DENNIS DOYLE,**

**Defendant.**

Defendant Dennis Doyle, through his attorney, Elizabeth G. Daily, moves this Court to continue the trial in the above-entitled case, which is presently scheduled for May 10, 2022, for a period of approximately 120 days to September 7, 2022, or a date thereafter convenient to the Court. This motion is made based on the need for time to complete discovery, investigate the case, conduct research, and consult with Mr. Doyle regarding his case. No continuances have been sought by the defense. This motion is unopposed by Assistant United States Attorney Natalie Wight.

This continuance constitutes excludable delay pursuant to Title 18, United States Code, Section 3161(h)(7)(A) and (B). The ends of justice served by granting this motion outweigh the

best interests of the public and Mr. Doyle in a speedy trial because the additional time is necessary to afford defense counsel sufficient time to complete discovery, investigate the case, conduct research, consult with Mr. Doyle, and prepare his case. Mr. Doyle acknowledges his right to a speedy trial under the Speedy Trial Act and agrees that this motion will result in excludable delay under the Act.

Respectfully submitted this 26th day of April, 2022.

/s/ Elizabeth G. Daily

Elizabeth G. Daily  
Attorney for Defendant